Message

From: Partridge, Charles [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=27DA56DA9A12472787EF56077099CF36-PARTRIDGE, CHARLES]

Sent: 12/5/2019 9:08:26 PM

To: Wall, Dan [wall.dan@epa.gov]; OBrien, Wendy [OBrien.Wendy@epa.gov]; Wardell, Christopher

[Wardell.Christopher@epa.gov]; Mylott, Richard [Mylott.Richard@epa.gov]; Barnicoat, Dana

[Barnicoat.Dana@epa.gov]

Subject: Fwd: Next steps -- Butte meconium study

Attachments: agenda -- board of health -- dec. 4, 2019 4.docx; ATT00001.htm

Sent from my iPhone

Begin forwarded message:

From: "Sullivan, Karen" <ksullivan@bsb.mt.gov> Date: December 5, 2019 at 1:55:50 PM MST

To: "Vranka, Joe" <vranka.joe@epa.gov>, "Greene, Nikia" <Greene.Nikia@epa.gov>, "Partridge, Charles" <Partridge.Charles@epa.gov>, "McGrath, Shaun" <Shaun.McGrath@mt.gov>, "Stoops, Thomas" <TStoops@mt.gov>, "Reed, Daryl" <dreed@mt.gov>, "Hogan, Sheila" <SheilaHogan@mt.gov>, "Harwell, Todd" <tharwell@mt.gov>, "Williamson, Laura" <lwilliamson@mt.gov>, "Ferguson, Matthew" <Matthew.Ferguson@mt.gov>

Cc: "Palmer, Dave" <dpalmer@bsb.mt.gov>, "Sesso, Jon" <jsesso@bsb.mt.gov>, "Maffei, Mollie" <mmaffei@bsb.mt.gov>, "Hassler, Eric" <ehassler@bsb.mt.gov>, "Crain, Julia" <jcrain@bsb.mt.gov>, "Olsen, Dan" <dolsen@bsb.mt.gov>, "ivy.fredrickson@gmail.com" <ivy.fredrickson@gmail.com> Subject: Next steps -- Butte meconium study

Hello: I am sure most or all of you have seen the headlines our city has attracted in the advent of the release of the recent meconium study focused on metals concentrations in Butte newborns. I am including the links here for you either way:

- https://mtstandard.com/news/local/health-study-shows-startling-levels-of-metals-in-butte-babies/article_d7c10bb3-68b6-588f-9028-a828ab17d034.html
- https://mtstandard.com/news/local/county-epa-state-pledge-further-look-at-meconiumstudy/article_fa0ab36a-3e4f-5dee-8d0e-bf3bb2bcb8bc.html

I want to thank those of you included in this email who attended yesterday's Butte-Silver Bow Board of Health meeting – Charlie Partridge, Laura Williamson and Matthew Ferguson.

Like others, including those on the Butte-Silver Bow Superfund team, I was shocked and puzzled by the meconium findings published by Suzanne McDermott, PhD, and Jamie Lead, PhD of the University of South Carolina, and Katie Hailer, PhD, of Montana Technological University. A member of the Board of Health, Seth Cornell, MD, asked me last week to invite Dr. Hailer to the Board of Health meeting – I facilitated that invitation and included her presentation on the Board of Health agenda (attached). Yesterday's meeting included a brief summary by Dr. Hailer on the study's findings.

Beginning this past Monday afternoon, I began hearing that there were alleged problems with the study's datasets in relation to manganese, copper and arsenic samples, that in fact some data in the study were inaccurate as the data relates to ug/kg and ug/g measurements. I also had heard from many people that they intended to attend the Board of Health meeting to hear Dr. Hailer's report. I alerted

the Board of Health vice chair Ivy Fredrickson to both, that I was hearing of data flaws and that several people would be attending the Board of Health meeting, including many who were beginning to question the data. Ivy and I were both sensitive to Dr. Hailer presenting in a forum that was suddenly potentially hostile in nature; Ivy was able to reach Dr. Hailer via email to alert her that some hard questions might be coming her way.

The Montana Standard article in the second link above is accurate in its portrayal of the meeting – the community is indeed alarmed and talking about this, and EPA, the state and Butte-Silver Bow did pledge to dig further to validate the "pilot study" data, or invalidate those data.

As Butte-Silver Bow's health officer, I am in a position in which I need to generally support additional data related to my community's health. But I am not willing to stand by and see Butte continue to be leveraged — especially if the data are flawed — in the hopes that somehow these studies, often published in obscure journals with questionable peer review processes, will generate additional research dollars. Any economic developer Googling my town might certainly look to other communities, where residents aren't dying en masse of brain cancer and babies aren't being born with high levels of metals in their meconium.

Further, I cannot support researchers who automatically espouse that exposure to metals and our contaminants of concern are the cause of brain cancer, other cancers and sick babies. Though ATSDR recently published a link between exposure to extremely high levels of lead and brain cancer, there is no science to my knowledge that makes these aforementioned links.

Potentially bad science is hurting my town in ways that could be irreparable.

Charlie Partridge briefly mentioned yesterday following the Board of Health meeting that the Butte Health Study Working Group might be leveraged to communicate further about the McDermott/Hailer findings. Charlie is also cited in today's Montana Standard article that this approach might be used. I initially thought yesterday that this was a valid collaborative approach, but after thinking it through yesterday and speaking to some of my colleagues, I believe that the Health Study Working Group does not have near the strength that the EPA brings to this issue.

Therefore, I am officially asking that the EPA take the lead on contacting McDermott and Hailer with an official concern that their study is flawed, and that they provide immediately any available samples and raw data so that a confirmation/validation process can be launched. Should the study prove invalid, I ask that the EPA take the lead on ensuring that a corrective process with the researchers, the journal, the peer reviewers and oversight officials at the University of South Carolina and Montana Tech be undertaken, in a very, very public manner.

Butte has many questions regarding issues related to historic mining activity and current-day mine operations. The reigning health issues in my town are related directly to environment. Therefore, I am also officially asking for support from the Montana Department of Environmental Quality and the Montana Department of Public Health and Human Services to provide epidemiological and toxicology resources, as well as resources related to air, water and soil quality in Butte-Silver Bow. Butte-Silver Bow residents should not have to live and work in an environment in which they're continually worried about their health, and struggling economically because development won't happen in a perceived toxic town.

Though a cleanup we deserve is imminent, Butte-Silver Bow residents have sustained for years the stain that comes with environmental damage and from being a mining community. On top of everything else, we don't deserve well-publicized allegedly flawed health studies.

Thank you to the EPA for your consideration of my request to take the lead in the follow-up with the researchers, and ensuring that a potential "make it right" process follows in a very public way, and thank

you to DEQ and DPHHS for your consideration of professional support in the days to come – Karen Sullivan



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